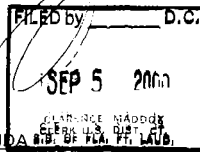


United States District Court



SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Shannon Gerraughty

CASE NUMBER: 00-4216-BSS

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between December, 1999 and January 21, 2000, in Broward ^{21 BY} County ^{FROM BENCH, AND MONTEN} in the ^{COUNTIES BY} Southern District of Florida, the defendant did, (Track Statutory Language of Offense)


knowingly execute a scheme and artifice to defraud a financial institution and to obtain moneys under the control of said institution(s) by means of false pretenses and representations,

in violation of Title 18 United States Code, Sections 1344 and 2

I further state that I am a Special Agent, FBI and that this complaint is based on the following:

See Attached Affidavit

Continued on the attached and made a part hereof: ☒ Yes ☐ No


Daniel H. Tejada, Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence,

Sept 5, 2000
Date

Barry S. Seltzer, United States Magistrate Judge
Name and Title of Judicial Officer

at Fort Lauderdale, Florida
City and State


Signature of Judicial Officer

AFFIDAVIT

Before me, the undersigned, personally appeared Daniel H. Tejada, who, being duly sworn, deposes and says:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation and has been employed in that capacity for fifteen (15) years. I am currently assigned to the White Collar squad in Miami, FL.

2. In or about March, 2000, I met with fraud investigators from the First Union National Bank and Bank of America, both federally insured financial institutions, regarding an apparent check fraud scheme, wherein individuals were depositing counterfeit checks into bank accounts and withdrawing the proceeds. In particular, I learned that on or about January 18, 2000, an individual deposited a check in the amount of \$50,000 into the First Union Bank account of one Shannon Bohannon. The check, which was counterfeit, was drawn on a Washington Mutual bank account under the name of Diane Martin. The funds were then withdrawn from the account over a several day period. ^{BETWEEN JANUARY 18 AND JANUARY 21} Several withdrawals were made from ATM machines. Forty Thousand dollars (\$40,000) were withdrawn at the counter of the Galleria branch of First Union Bank in Broward County, FL.. Shannon Bohannon denied knowledge of these transactions and executed an affidavit to that effect.

3. First Union bank officials were able to pull surveillance photographs from the above mentioned ATM transactions and also the bank transaction at the counter at the Galleria branch. Those photographs depict an individual whom I have come to recognize as one SHANNON GERRAUGHTY engaging in the transactions.

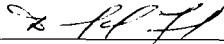
3. I further learned that, between 12/28/99 and 12/30/99, a series of counterfeit checks

totaling approximately \$14,000, were cashed at Bank of America branches in Palm Beach County, Florida. In each instance, an individual presenting identification as "Tina Jakoby" would cash checks under \$1000. The checks were drawn on Bank of America accounts held by the North Dade Chamber of Commerce and Williams Island Property Owner's Association.

4. On December 30, 1999, SHANNON MARIE GERRAUGHTY was arrested by the Martin County Sheriff's Office as she attempted to cash a counterfeit check at a branch of Nationsbank in Jensen Beach, FL. GERRAUGHTY had in her possession a fraudulent Florida Driver's license under the name Tina Jakoby.

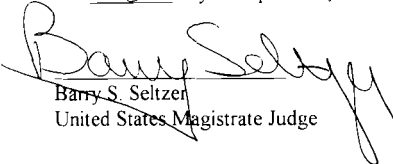
5. Bank of America officials were able to pull surveillance photographs from several of the other bank transactions conducted by "Tina Jakoby". Those photographs depict SHANNON GERRAUGHTY as the individual conducting the transactions.

6. Therefore, I have probable cause to believe that SHANNON GERRAUGHTY has engaged in a scheme to defraud First Union National Bank and Bank of America.



Daniel H. Tejada
Special Agent, FBI

Sworn and subscribed to before me
this 5th day of September, 2000



Barry S. Seltzer
United States Magistrate Judge